

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

NATIONAL ASSOCIATION FOR GUN RIGHTS, and	)	
SUSAN KAREN GOLDMAN,	)	
	)	
Plaintiffs,	)	Case No. 22-cv-04774
	)	
v.	)	
	)	
CITY OF HIGHLAND PARK, ILLINOIS,	)	
	)	
Defendant.	)	

**DECLARATION OF SUSAN KAREN GOLDMAN**

I, Susan Karen Goldman, state the following under oath as if testifying in court:

1. I am a resident of the City of Highland Park, Illinois and have been since 1995.
2. I am a law-abiding citizen of the United States.
3. I currently own an AR-15, semi-automatic firearm, and intend to purchase magazines capable of holding more than 10 rounds of ammunition—both of which are putatively made illegal by Highland Park Code Chapter 136.
4. I have possessed this property lawfully for years but I store it outside of the city limits because I fear prosecution under the Ordinance.
5. I desire to continue possessing my lawfully owned firearm and ammunition described above, and to acquire additional arms and ammunition putatively made illegal by the Code, and lawfully transfer property to others within the city limits.

6. But for the City's restrictions on commonly used arms, and my reasonable fear of criminal prosecution for violating these restrictions, I would continue to possess my lawfully owned firearm and ammunition, acquire additional arms and ammunition, and/or transfer them to others.

7. I am especially irreparably harmed because the City's prohibitions require me to store my firearm outside the city limits, which renders it useless for the defense of my home and my person, especially in light of incidents such as the recent July 4, 2022 shooting which occurred within city limits leaving seven (7) dead and more than two (2) dozen injured.

8. Further Declarant sayeth naught.

I, Susan Karen Goldman, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that I have reviewed the foregoing, that I am competent to testify in this matter, and that the facts contained therein are true and correct.

s/Susan Karen Goldman  
Susan Karen Goldman

9/29/2022  
Date